



BEC

REMOVAL ACTION WORK PLAN

Prepared for:

Sunkist Growers, Inc.

Site Name/Location:

Former Sunkist Citrus Processing Plant
616 E. Sunkist Street
Ontario, California

June 4, 2010

Bowyer Environmental Consulting
17011 Beach Boulevard, Suite 900
Huntington Beach, CA 92647
T: 877-232-4620
F: 714-840-4963

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BEC Project No.: 08010003


June 4, 2010

Prepared For:
Charles L. Woltmann
Sunkist Growers Inc.
14130 Riverside Drive
Sherman Oaks, CA 91423



Prepared by:
Bowyer Environmental Consulting, Inc.
17011 Beach Boulevard, Suite 900
Huntington Beach, California 92647
T: 877.232.4620
F: 714.840.4963

The material and data in this report were prepared by and/or under the supervision and direction of the undersigned.

 Date June 4, 2010
Brain Bauer
Staff Scientist
Bowyer Environmental Consulting, Inc


 Date June 4, 2010
Brett H. Bowyer, P.G.
Principal
Bowyer Environmental Consulting, Inc.

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At the request of Sunkist Growers Inc. (Sunkist), Bowyer Environmental Consulting, Inc. (BEC) has prepared this Work Plan to conduct additional remedial and monitoring activities at the former Sunkist Citrus Processing Plant (Site). The Site is located at 616 East Sunkist Street in Ontario, California, as shown on Figure 1.

The primary objectives associated with this Work Plan are to:

- Monitor foundation removal activities associated with the demolition of the facility;
- Sample and evaluate environmental conditions in any suspect areas identified during the foundation removal activities; and
- Implement soil removal and confirmation sampling activities at previously identified and any newly identified (during foundation removal activities) areas of concern.

This report is organized into the following sections:

- Section 1 describes the objectives and defines the organization structure;
- Section 2 presents a summary of historical property use, describes regional hydrogeology, summarizes previous environmental investigations/remedial actions, and describes the above-ground demolition work that has been completed to date;
- Section 3 summarizes the objectives and scope of work associated with the removal actions (remedial excavations) to be implemented in the two remaining areas that were identified during the previous environmental work;
- Section 4 summarizes the environmental monitoring tasks that will be implemented during the demolition of surface and sub-grade features;
- Section 5 describes activities associated with the management, transportation and disposal of impacted materials;
- Section 6 describes the Remedial Completion Report that will be prepared following field work;

- Section 7 presents the conceptual schedule associated with the field work and report preparation efforts; and
- Section 8 lists the references utilized in the preparation of this Work Plan.

2.0

BACKGROUND

The approximately 11.11-acre Site is located in the City of Ontario, approximately 1 mile west of the Ontario International Airport, and between the San Bernardino Freeway (Highway 10) to the north, and the Pomona Freeway (Highway 60) to the south. The Site is bounded primarily by industrial properties, although a residential neighborhood is located directly west of the northern portion of the Site.

2.1

GENERAL GEOLOGY AND HYDROGEOLOGY

The Site is located within the Pomona/Chino Valley, which is bordered on the north by the San Gabriel Mountains, on the east by the San Jacinto Fault, on the south by the Santa Ana Mountains, and on the west by the San Jose/Puente/Chino Hills. The area near the Site is reportedly underlain by young alluvial fan deposits of fine- to coarse-grained sedimentary units formed by the San Antonio Creek and its tributaries (California Department of Conservation, Division of Mines and Geology, 2000).

A significant groundwater investigation is being conducted to the west of the Site in association with the former General Electric Company Flatiron facility (234 East Main Street, Ontario, California). Based on the 3rd Quarter 2008 Groundwater Monitoring Report (AMEC, Geomatrix, Inc., November 24, 2008) the depth to groundwater within the general vicinity of the Site is between 265 and 369 feet beneath ground surface (bgs). Groundwater reportedly flows towards the south within the general vicinity of the Site.

2.2

HISTORY OF SITE OPERATIONS

According to the *Historic Context for the City of Ontario's Citrus Industry* (City of Ontario Planning Department, February, 2007), the Site was developed as a citrus by-products plant in 1926 by the Ontario Citrus Exchange. The Ontario Citrus Exchange was part of the California Fruit Growers Exchange (Central Exchange) which was formed originally in 1893 (as the Southern California Fruit Growers Exchange). The Central Exchange was formed as a not-for-profit marketing cooperative designed

to help growers distribute their product from the orchards to the market. The Central Exchange provided uniform methods of packaging and shipping, and established a standard for pricing. In 1952 the Central Exchange officially changed its name to Sunkist Growers, Inc., based on the success of the “Sunkist” brand name. Today, Sunkist continues to be one of the ten largest marketing cooperatives in the United States.

Based on a Sanborn map from 1928 (City of Ontario Planning Department, February, 2007), the original plant built on the Site housed, canning, compressor, evaporator, cold storage and warehousing facilities. This plant was reportedly originally designed to handle a large part of what would have otherwise been unmarketable fruit from the Ontario area. An aerial photograph dated from the 1930s shows buildings 11, 12, 13, 21, part of 23 and possibly 31. Additional structures were added on the southern section of the plant between the 1950s and the 1980s.

As of early 2010, the site consisted of 23 buildings, a waste water treatment plant, a Dryers Area, a Waste/Heat area, a Wet Peel Area, two large fruit bins, and a fenced in Edison Transformer. These operational features are shown on Figure 2. An extensive storm drain system was installed in the Site in association with the Site development. Figure 3 shows the known location of subsurface lines associated with the storm drain system.

For the most part Sunkist terminated citrus processing at the Site in 2008. The waste water treatment plant continues to operate at the Site to accommodate the ongoing bulk storage operation that Partners Alliance operates at 617 E. Sunkist Street (directly north of the Site).

2.3 FUTURE PLANNED PROPERTY USE

The City of Ontario (City) is in the process of acquiring the site. It is our understanding that the City plans to hold the property for a period of time pending future development. Future development plans that have been suggested involve the development of a new multi-tenant industrial park.

2.4 PREVIOUS ENVIRONMENTAL INVESTIGATIONS

On behalf of the City, Leighton Consulting, Inc. (Leighton) conducted a Limited Phase II Environmental Site Assessment (Phase II Investigation) at the Site in October 2008. In addition, BEC conducted a data gap

investigation in August 2009. A total of 101 soil borings were installed and sampled during these two programs. In addition, 32 shallow (5.0 foot) and 14 deeper (15 foot) soil vapor points were installed and sampled during these efforts. The location of these soil and soil vapor sampling locations are shown on Figures 4 and 5, respectively.

The soil vapor samples were all analyzed for volatile organic compounds (VOCs) by USEPA Method 8260B. Selected soil samples were analyzed for one or more of the following parameters:

- California Administration Manual (CAM) metals by USEPA Method 6000 and 7000 Series;
- Hexavalent chromium by USEPA Method 7096A
- Total petroleum hydrocarbons (TPH) in the gasoline, diesel and oil ranges by USEPA Method 8015M;
- Polyaromatic hydrocarbons (PAHs) by USEPA Method 8270C SIM;
- Semi-volatile organic compounds (SVOCs) by USEPA Method 8270C;
- Polychlorinated biphenyls (PCBs) by USEPA Method 8082;
- Pesticides by USEPA Method 8081A; and
- VOCs by USEPA Method 8260B.

Six geophysical anomalies (Anomaly A through F) and three areas of impacted soil (Areas 11C, Area 20, and Area 24C) were identified during these efforts. In order to address potential subsurface impacts, BEC implemented an excavation and soil removal program between April and June 2009. As summarized in BEC's July 31, 2009 Interim Report - Soil Removal and Confirmation Sampling Report (Interim Report), most of the areas and anomalies identified during the investigations were addressed during this excavation and soil removal program. However, due to the presence of existing structures, further excavations and soil removal activities in two areas were deferred until the overlying structures had been removed. The two areas that remain, and need to be addressed are described as follows:

- **Area 11C** Under the Wet Peel Structure (Figure 2) – This area underlay a bank of electrical panels that were formerly present on the western side of the Wet Peel Structure. During Site investigation activities, PCBs in excess of conservative screening criteria (CSCs – See Section 3.0 for definition) were identified in this area. Five rounds of excavation and confirmation sampling were

conducted in this area. However access to the area was limited based on the presence of the Wet Peel Structure, and as of the last round of confirmation sampling, PCBs were still found to be present at concentrations in excess of CSCs in a limited area at this location.

- **Area 24C** Between Building 14 and the Equipment Foundation (Figure 2) - A debris-filled, bowl-shaped concrete structure was partially removed from this area. The debris was found to contain total and soluble lead in excess of CSCs. Following the partial removal of the bowl-shaped structure, soil to the east, to the west and beneath the structure was found to not contain total or soluble lead in excess of the CSCs. However debris, which may contain elevated lead, remained near and possibly under Building 14 to the north, and beneath the Equipment Foundation to the south.

2.5

UNDERGROUND STORAGE TANK REMOVAL PROGRAMS

Available permit records (Dames and Moore, January 9, 1996 and Leighton, September 8, 2008) indicate that seven to eight underground storage tanks (USTs) were at one time located at the Site. Based on these records, Dames and Moore (D&M) reported that three, 50,000-gallon, one 12,000-gallon, one 10,000-gallon, and one 1,000-gallon diesel USTs, and one 10,000-gallon and one 2,000-gallon gasoline USTs were located at the Site, each of which had been closed. Based on available records, Leighton reported that one 12,000-gallon, two 10,000-gallon, and three 50,000-gallon diesel USTs, and one 10,000-gallon gasoline USTs were located on the Site. One of these tanks (a 10,000-gallon diesel UST) was backfilled in place in 1999, under the direction of the County of San Bernardino Fire Department – Hazardous Material Division (County). The County issued a letter (May 14, 1999) to Sunkist which stated that no further investigation was necessary in association with this UST.

Information that contradicted the permitted record with respect to historic USTs was also provided in an appendix (Appendix A) of the D&M report based on interviews that were conducted with former Sunkist employees (Mr. Denny Nelson and Mr. David Cooper). This information suggested that an 8,000 gallon fuel oil UST is still present near Building 23, two buried railcars (of unknown size) used to store fuel oil are present between Building 23 and Building 34, three fuel oil USTs (of unknown size) are present near the northeast corner of Building 23.

Based on the reports, from Mr. Nelson and Mr. Cooper, Leighton conducted a geophysical survey, and BEC conducted pothole excavations at anomalies identified during the geophysical survey. No buried USTs were identified during the pothole excavation program (BEC, July 31, 2009). In addition, a follow up site walk and interview was conducted with Ms. Kathie Blyskel on February 26, 2010. Ms. Blyskel is a current Sunkist employee and worked at the Site during the 1990s. She indicated that one of her responsibilities was to close out the remaining UST that was present at the Site at that time. She managed the closure in place of the UST in 1999 and recalled that all other USTs had been closed out previous to that time. Ms. Blyskel did not have any record of any other in-place UST closures on the Site. The location of the 10,000-gallon UST that was closed on the Site in 1999 is provided on Figure 6.

The County performed a facility audit in February of 2009. Based in part on that audit, and information provided by Sunkist to the County as a follow up to the audit, the County determined that a secondary receiver of anhydrous ammonia fit the definition of an UST. As such, this UST was permitted and subsequently (November 19, 2009) removed from the Site. During UST removal activities, soil samples were collected from under the UST and from beneath piping to the north of the UST. The UST removal activities and the results of the soil sampling were summarized in an UST Removal Report (BEC, January 15, 2010) which was submitted to County. Based on the activities performed and results obtained, the County issued a letter (February 1, 2010) to Sunkist which stated that no further investigation was necessary in association with the UST.

2.6 *INITIAL DEMOLITION ACTIVITIES*

During late 2009 and the first part of 2010, partial demolition activities began at the Site. These activities include the removal of most of the 23 above-ground building structures. Currently all of the above-ground structures have been removed except for Buildings 12, 15, 22, 31, 41, 42 and 52. Aboveground structures associated with the Dryers Area, Waste Heat Area, Wet Peel Area and Waste Water Treatment Plant are also being demolished as part of this effort. In addition, above-ground storage tanks, above-ground piping and associated ancillary equipment are also being demolished and either disposed of, or recycled off-Site as part of the above-ground demolition program. Concrete associated with these structures is being processed and temporarily stockpiled on Site.

Asbestos and lead abatement activities are being performed in association with the demolition of buildings, as necessary based on detailed surveys that have been performed. These abatement activities are being conducted as per the requirements of the South Coast Air Quality Management District (SCAQMD).

The removal of foundations, pavements, roads, basements, or other ground-levels features was not part of this initial scope of work. The removal of these ground and sub-grade features will be monitored as described in Section 4.0 of this Work Plan.

In anticipation of the removal of sub-grade structural features, BEC collected samples from nine lifts that are present at the site. The location of the lift reservoirs is shown on Figure 8 and described as follows:

- L-12-1 – Located in a fenced area to the east of the southern lift within the basement of Building 12. This reservoir was the northernmost reservoir in the fenced area. A sample of oil was obtained from this reservoir on April 13, 2010.
- L-12-2 – Located in a fenced area to the east of the southern lift within the basement of Building 12. This reservoir was the easternmost reservoir in the fenced area. A sample of oil was obtained from this reservoir on April 13, 2010.
- L-12-3 – Located in a fenced area to the east of the southern lift within the basement of Building 12. This reservoir was the southernmost reservoir in the fenced area. A sample of oil was obtained from this reservoir on April 13, 2010.
- L-13 – Located in a room directly west of the lift on the second floor of Building 13. A sample consisting of two phases (aqueous and oil) was obtained from this reservoir on April 13, 2010.
- L-21 – Located in a room directly north of the lift within the basement of Building 21. An aqueous phase sample was obtained from this reservoir on April 13, 2010.
- L-31 – Located in a fenced area directly north of the northern lift within the basement of Building 31. A sample of oil was obtained from this reservoir on April 13, 2010.
- L-42-1 – Located in a fenced area directly west of the southern lifts within the basement of Building 31 (not in Building 42). This reservoir was the northernmost reservoir in the fenced area. A sample of oil was obtained from this reservoir on April 13, 2010.

- L-42-2 – Located in a fenced area directly west of the southern lifts within the basement of Building 31 (not in Building 42). This reservoir was the southernmost reservoir in the fenced area. A sample of oil was obtained from this reservoir on April 13, 2010.
- L-64 - Located in a room directly west of the lift within the basement of Building 64. An aqueous phase sample was obtained from this reservoir on February 11, 2010.

All nine of these samples were delivered to ABC Environmental Laboratories in Ontario, California. Ten analyses for PCBs (via USEPA Method 8082) were performed on the nine samples (both the oil and aqueous phases of L-13 were analyzed separately). Copies of the analytical results are provided in Appendix A.

The results of the analyses are summarized on Table 1. As shown, PCBs were only detected in one of the samples (L-64). Based on these results, liquid in each of the other reservoirs did not exhibit the presence of PCBs.

3.0 *REMOVAL ACTION OBJECTIVES AND SCOPE*

As described in Sections 2.4, Site investigations identified several areas of concern, and remedial actions have been taken to partially address these issues. The remedial actions at two of these areas (Area 11C and Area 24) were not completed due to the presence of overlying structures. The objectives and scope of planned removal actions in these two areas are described in the following subsections.

3.1 *REMOVAL ACTION OBJECTIVES*

The primary remedial action objections (RAOs) for all removal actions to be implemented at the Site are to eliminate subsurface soil that contains chemical compounds that exceed CSC. The CSC for this Site include:

- California Human Health Screening Criteria (CHHSLs) for commercial/industrial property use;
- USEPA Regional Screening Levels (RSLs) for soil at industrial sites; and
- California Total Threshold Limit Concentrations (TTLCs) and Soluble Threshold Limit Concentrations (STLCs).

Additional RAOs for this project include the protection of the health and safety of site workers involved in the remediation, and the protection of Site neighbors and the public at large during the remedial action work. If necessary a post-removal risk assessment will be conducted to document that any residual concentrations in excess of CSC do not represent an unacceptable level of risk, based on future planned commercial/industrial land use.

3.2 *SCOPE OF REMOVAL ACTIONS*

To accomplish the RAOs the following general guidelines and protocols will be followed during the implementation of the removal actions:

- All shallow soils from surface to 10 feet bgs which exhibit concentrations in excess of CSC will be targeted for removal and disposal at an approved, off-site disposal facility;

- All removal activities shall be conducted under a Site-specific Health and Safety Plan (HASP);
- Dust suppression measures shall be implemented during all removal activities, to the extent required, to prevent the entrainment of soil particles in air and the off-site transport of soil by wind;
- Air quality will be monitored in the worker's breathing zone during excavation activities and measures will be implemented, to the extent required, to prevent unacceptable dust generation;
- All excavated soil leaving the Site shall be covered/secured to prevent accidental spillage during transport; and
- Post-excavation confirmation soil sampling and the comparison of associated analytical data to the CSC will be performed; and

The following subsections describe the field procedures and methods that will be used in the two areas of planned soil removal (Removal Areas). All field activities associated with these activities will be conducted under the supervision of a California professional geologist (PG) or professional civil engineer (PE). It should be noted that the procedures described in this section will also apply to any newly identified Removal Areas based on the results of environmental monitoring conducted during the removal of surface and sub-surface structural features, as described in Section 5.0.

3.2.1 *Permitting and Notifications*

All necessary permits will be obtained prior to implementing the planned removal action activities. Copies of the permits will be posted on site and made available for inspection during working hours. Permits that may be necessary in association with the planned work include:

- City of Ontario – As less than 250 cu yd of soil are to be excavated, it is anticipated that a grading permit specific to the Removal Actions will not be necessary. As grading activities associated with the overall demolition program will involve obtaining this permit, it may be decided by Sunkist to obtain a single grading permit to cover all Removal Area and rough grading activities.
- South Coast Air Quality Management District (SCAQMD) Rule 403 – Dust monitoring and/or dust mitigation measures/best management practices (BMPs) associated with Rule 403 requirements will be implemented during the Removal Actions to demonstrate compliance. In addition, air monitoring for dust will be performed in the worker's

breathing zone using a direct-reading dust monitor during the excavation activities and soil handling, consistent with standard health and safety procedures for monitoring worker exposures. Specific procedures and monitoring details that provide for the protection of workers at during the Removal Actions are defined in the site-specific Health and Safety Plan (HASP).

- SCAQMD Rule 1166 – Based on previous investigations, it is not anticipated that volatile organic compound (VOC) concentrations that trigger the need to acquire site-specific SCAQMD 1166 permit requirements. However, air monitoring activities will be performed in compliance with the methods specified under Rule 1166 during excavation efforts associated with the Removal Actions. If necessary based on these measurements, the SCAQMD will be notified and other action will be taken per the contractors existing 1166 Permit requirements.
- Storm Water Pollution Prevention – A Storm Water Pollution Prevention Plan (SWPPP) has been prepared for the overall demolition program. In addition, a Notice of Intent (NOI) has been filed with the State of California Water Resources Control Board (SWRCB), and the SWRCB has issued a Waste Discharge Identification Number (WDID 8 36C357117) for this Site. Sunkist is currently in the process of recertifying the NOI under Order 2009-0009-DWQ. Appropriate BMPs, as specified in the SWPPP will be followed during the implementation of the Removal Actions.

Underground Service Alert (USA) has been notified in advance of the overall demolition program. USA has contacted all utility owners of record within the vicinity and notifies them of our intent to excavate. All utility owners of record are responsible for clearly marking the position of their utilities on the ground surface throughout the designated area. The USA ticket number will be updated in advance of the Removal Actions in order to check that all utilities in the Removal Action areas have been marked.

3.2.2 *Health and Safety Plan*

Prior to commencing Removal Action activities, BEC will develop a HASP to provide guidelines for safe conduct of the field activities proposed for this project. The HASP will include precautions for field personnel conducting intrusive investigations at the Site.

Prior to the commencement of each day's activities, a tailgate health and safety meeting will be held. Site personnel working at the at the Site removal actions will be required to have the appropriate health and safety training for the work to be performed (40-hour Occupational, Safety and Health Administration [OSHA] hazardous waste training and current annual training at a minimum), be familiar with the HASP, and attend the daily tailgate meetings or health and safety briefings. Site personnel will be required to sign the site-specific HASP to demonstrate that they are familiar with the HASP and that they participated in, or were briefed on, the daily tailgate meeting. Additional health and safety requirements will be identified in the HASP.

Visitors to the Site (including truck drivers) will normally be kept out of the exclusion zone associated with the Removal Areas. Visitors and/or truck drivers entering the exclusion zone will be required to demonstrate that they have the appropriate 40-hour OSHA hazardous waste training and current annual training. These visitors and truck drivers will also need to review and sign the HASP.

3.2.3 *Excavation Activities*

Prior to implementing the excavations Removal Areas, the surface cover will be removed. Following this a backhoe will be utilized to excavate soil. The horizontal and vertical extents of planned excavations in the two identified Removal Areas are summarized as follows:

- **Area 11C** – The location of Area 11C is shown on Figure 2. During Site investigation activities, PCBs in excess of CSCs were identified in this area. Five rounds of excavation and confirmation sampling were conducted in this area. However access to the area was limited based on the presence of the Wet Peel Structure, and as of the last round of confirmation sampling, PCBs were still found to be present at concentrations in excess of CSCs in a limited area at this location. Figures 9 and 10 show the extent of excavations conducted in this area. As shown, following the excavation efforts, three samples collected at depths of approximately 10 feet bgs on the northern side of the excavation (11C-29, 11C-30, and 11C-31), and one sample at a depth of approximately 1.5 feet bgs on southern side of the excavation (11C-28) contained PCB concentrations in excess of CSC (Commercial/Industrial CHHSL of 300 ug/kg). As such, planned Removal Action excavations will consist of approximately 2.0 feet of soil from the southern wall of the former excavation, and approximately 2.0 feet of soil from 10 to

12 feet bgs on the northern 7.0 feet of the previous excavation. Following the completion of these additional excavation efforts, a total of five additional soil samples will be collected and analyzed for PCBs. The extent of the planned excavations and location of planned post-Removal Action confirmation samples are shown on Figure 10.

- **Area 24C** – The location of Area 24C is shown on Figure 2. During Site investigation activities, a debris-filled, bowl-shaped concrete structure was found to be present in this area. The debris was found to contain total and soluble lead in excess of CSCs. Following the partial removal of the bowl-shaped structure (and associated debris), soil to the east, to the west and beneath the structure was found to not contain total or soluble lead in excess of the CSCs. However debris, which may contain elevated lead, remained near and possibly under Building 14 to the north, and beneath the Equipment Foundation to the south. Figure 11 shows the extent of excavations conducted in this area and the results of the previous confirmation sampling efforts. Planned Removal Action excavations will consist of approximately 5.0 feet of soil from both the northern and southern walls of the former excavation. Approximately 18 feet of soil along the length of each wall will be removed, and the depth of the excavations will match that of the bottom depth of the former bowl-shaped concrete structure (approximately 5 feet). Following the completion of these additional excavation efforts, a total of ten additional soil samples will be collected and analyzed for total and soluble lead. The extent of the planned excavations and location of planned post-Removal Action confirmation samples are shown on Figure 11.

The results from the confirmation sampling efforts will be compared to CSCs. As previously stated, the CSC for this Site include:

- CHHSLs for commercial/industrial property use;
- USEPA RSLs for soil at industrial sites; and
- California TTLCs and STLCs.

If concentrations well in excess of CSC's are observed, additional excavations may be conducted and additional confirmation samples will be collected until the residual levels are below or near the CSCs. If warranted, based on the results, a post-removal risk assessment may be

conducted to document that any residual concentrations in excess of CSC do not represent an unacceptable level of risk, based on future planned commercial/industrial land use.

3.2.4 *Sample Collection*

Soil samples will be collected by driving a stainless steel sampling ring into the wall of a freshly excavated area. The ring will be sealed with Teflon™ sheets, capped, and properly labeled (including the time, date, location, project number, sampler name, sample depth, and a unique sample ID). Soil samples will be placed in sealed bags and stored in a cooler containing crushed ice. Sample coolers will be delivered at the end of the day to ABC Environmental Laboratories in Ontario, California under standard chain-of-custody procedures. Chain-of-custody forms will be completed at the time of sample collection, signed and relinquished to the laboratory with the coolers.

3.2.5 *Quality Assurance/Quality Control (QA/QC)*

Field QA/QC procedures for the shallow soil removal action and the post-excavation confirmation sampling will include the following:

- Calibration of all monitoring or measuring equipment prior to each day's activities; and
- Cleaning and decontamination of sampling equipment in an Alconox solution between sampling locations, including a double rinse in potable water, and a final rinse in deionized water. Rinsate water will be contained in 55-gallon drums.

4.0

ENVIRONMENTAL MONITORING DURING SURFACE AND SUB-GRADE STRUCTURAL DEMOLITION

During the removal of foundation, asphalt, roadways and other surface and sub-grade structural features, environmental monitoring will be performed to ensure that no new conditions are present that could represent the potential for additional impacts to subsurface soil. The environmental monitoring will consist of a three-tiered process, which includes:

- Visual monitoring of all exposed soil for obvious staining or other visual impact;
- Olfactory monitoring of all exposed soil for noticeable odors; and
- Field screening with a flame ionization and photoionization detector (FID/PID), in order to document soil that exhibits elevated readings of VOCs.

When soil that exhibits one or more of the three monitoring criteria is observed, the soil will be determined to be potentially impacted and the area will be classified as an Area of Concern (AOC). Additional sampling for a variety of priority pollutants will be conducted at each newly identified AOC. The sample collection and handling procedures employed will be identical to those described for the Removal Action activities (Section 4.0).

4.1

SOIL ANALYSIS

The samples collected from the AOCs will be analyzed for the following:

- VOCs by gas chromatography-mass spectrometry (GC/MS) using U.S. Environmental Protection Agency (USEPA) Method 8260B;
- Pesticides using USEPA Method 8081;
- Polynuclear aromatics (PNAs) by GC/MS with selected ion monitoring (SIM) using USEPA Method 8270C;
- CAM 17 metals using USEPA Method 6010B/7470;

- PCBs using USEPA Method 8082; and
- TPH using USEPA Method 8015M.

4.2 OTHER ISSUES OF POTENTIAL CONCERN

4.2.1 *Reuse of Concrete and Asphalt*

As discussed in Section 2.6, concrete associated with the previous buildings has been broken up and is currently stockpiled on Site. In addition, during the removal of surface and sub-grade features, additional concrete stockpiles will be generated. Sunkist plans on crushing the concrete and utilizing it as fill on the Site. In order to document the condition of the concrete discrete samples will be randomly collected from the broken up concrete. The number of samples taken will be consistent with the number specified in the Department of Toxic Substances Control (DTSC) *Information Advisory – Clean Imported Fill Material* (DTSC, October 2001). The collected samples will be pulverized and delivered to ABC Environmental Laboratories for analysis. Each of these samples will be analyzed for the parameters specified in Section 4.1, and evaluated as described in section 4.3. If the sample results meet the evaluation criteria specified in Section 4.3, then the broken concrete will be approved for use as fill. If the broken concrete does not meet these evaluation criteria, then the material will be profiled and shipped off Site for proper disposal.

4.2.2 *Soil Sampling Beneath Lifts*

As discussed in Section 2.6, the liquid in the reservoirs for the hydraulic lifts have been sampled. One of these samples (the lift at Building 64) was found to contain PCBs (aroclor 1254) at a concentration that exceeds California and USEPA Maximum Contaminant Levels (MCLs). As a precaution, soil samples will be collected from beneath the lift at Building 64. These samples will be delivered to ABC Analytical Laboratories, and analyzed for PCBS. The results will be compared to CSC. If results exceed CSC, this area will be treated as an additional Removal Area. As such, soil will be excavated and confirmation samples will be obtained, in a similar fashion to that described in Section 3.0. If the sample results do not exceed CSC, this area will be closed and no further remedial action will be necessary.

The results from the soil sampling activities described in Sections 4.1 and 4.2 will be compared to CSC. If concentrations in excess of CSC's are observed within in situ soil samples, the area will be designated as a new Removal Action area based on the specific compounds observed at elevated concentrations. As such, excavation and confirmation sampling will be implemented in these areas in a similar fashion to that described in Section 3.0. If concentrations in excess of CSC's are observed in stockpiled concrete, the specific impacted stockpiles will be further evaluated for off-site disposal and not reused on Site.

Based on the current plan, a total of approximately 4 cubic yards of PCB impacted soil will be excavated from Area 11C, and approximately 20 cubic yards of total and soluble lead impacted soil will be excavated from Area 24C. These volumes may increase if additional excavations are necessary to complete the planned removal action, or if additional removal areas are identified. Soil excavated from Removal Areas will be temporarily stockpiled at separate designated areas pending off-site transportation and disposal and/or off-Site recycling. Field drawings will be made to document the stockpile sample locations.

Once all analytical results have been obtained, the soil will be profiled. Upon acceptance, arrangements will be made by Sunkist to manifest and transfer the material to an appropriate off-Site facility.

The hauling contractor(s) used to transport contaminated waste will be fully licensed and permitted by the USEPA and the State of California. Transportation equipment will be chosen to safely transport the expected volumes of soil, taking into consideration the types of roads to be traveled and their loading capacity. Trucks will use only pre-planned and authorized routes, and all Department of Transportation and California Highway Patrol safety regulations will be strictly followed.

A detailed log of the loads hauled from the site will be maintained. The log will include, at a minimum, the date and the time trucks were loaded, the destination, size (volume and weight) of the load, description of contents, name and signature of the hauler, and name and signature of the contractor's representative. The waste will be off-loaded for disposal and/or recycled in a manner consistent with current USEPA, state, and local regulations.

During loading, dust emissions will be monitored and mitigated, if necessary, by the excavation contractor. The transportation and disposal contractor will ensure that the hauling trucks will be equipped to fully cover and contain all soil and debris during transportation, thereby preventing spillage or dust emissions.

Once the Removal Action and surface and sub-grade demolition activities have been completed, a Removal Action Completion Report will be prepared that documents the scope of work and results obtained. The report will include:

- Analytical results from all samples collected at AOCs and confirmation samples associated with the Removal Areas;
- Detailed maps showing the location of all AOCs, and the location and extent of the remedial excavations;
- Documentation regarding the amount and final disposition of soil disposed of off the Site; and
- Annotated photo documentation of the field work activities.

Once compiled, this information will be assembled as a bound report and will be submitted to the County for review, comment and approval.

Sunkist is currently planning on implementing the surface and sub-grade structural removal activities between mid-June and early September 2010. The Removal Action activities will be performed in conjunction with these activities at appropriately timed intervals, so that impacts to the overall demolition schedule are minimized. As mentioned previously, some portions of the demolition may be delayed as Sunkist is currently attempting to facilitate the relocation of cell towers that are currently present on top of existing structures. If the relocation of these cell towers, delays the completion of some aspects of the demolition, the County will be notified. However, based on the current schedule, field work associated with the surface and sub-grade structural removal activities, and Removal Actions will be completed by the first week of September, 2010. Following the completion of the field work, it will take approximately six weeks to acquire and validate all analytical results and to produce a Removal Action Completion Report. Based on this schedule, the Removal Action Completion Report will be provided to the County by October 15, 2010.

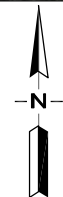
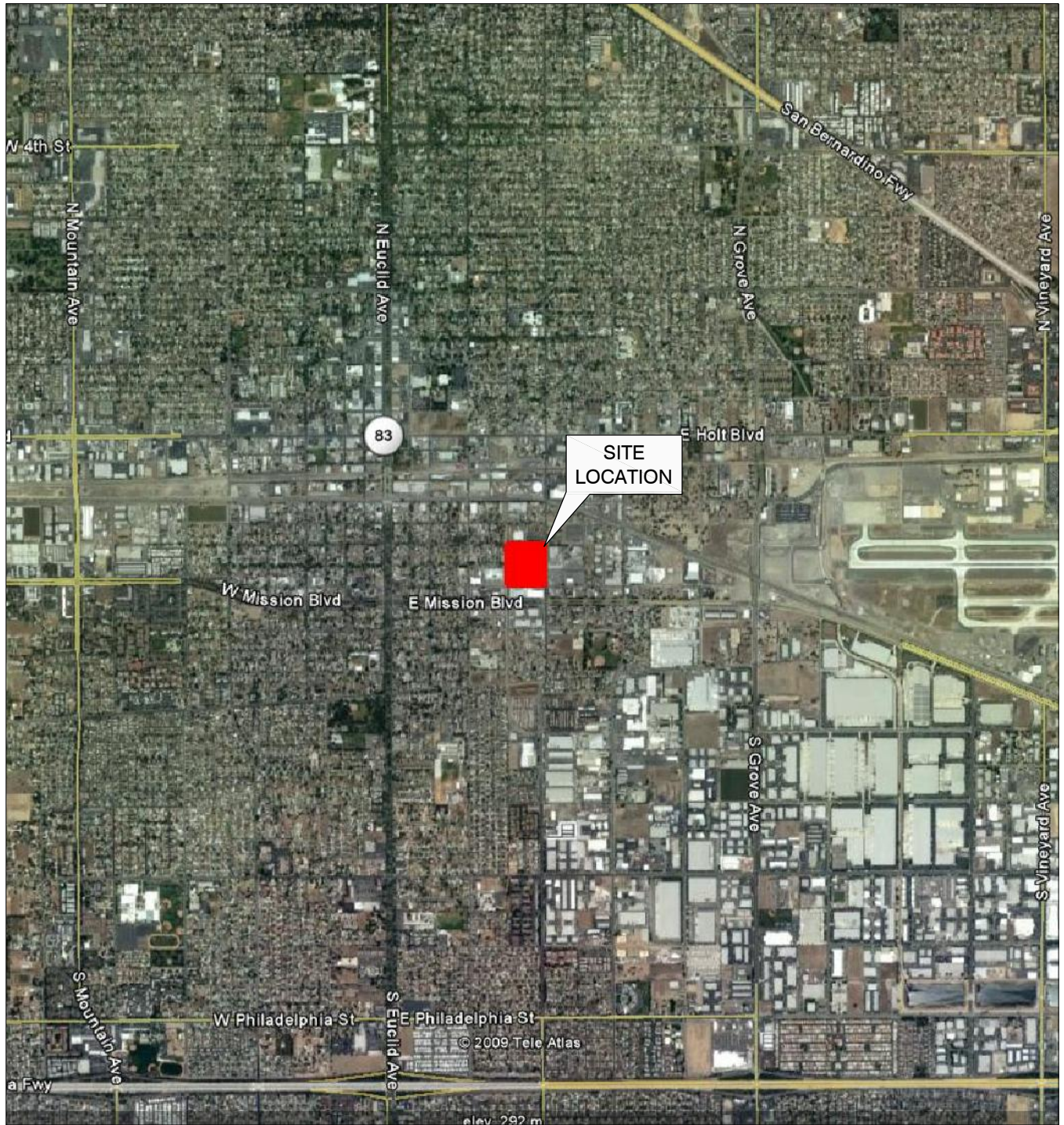
1. AMEC, Geomatrix, Inc. November 24, 2008. *3rd Quarter 2008* "Groundwater Monitoring Report."
2. Bradford, G.R., Change, A.C., Page, A.L., Bakhtar, D., Frampton, J.A., and Wright, H. March, 1996, "Background Concentrations of Trace and Major Elements in California Soils."
3. Bowyer Environmental Consulting, Inc. March 17, 2009. "Work Plan for Recommended Environmental Activities - Former Sunkist Citrus Processing Plant, 616 East Sunkist Avenue, Ontario, California."
4. Bowyer Environmental Consulting, Inc. July 1, 2009. "Workplan for UST Removal - Former Sunkist Citrus Processing Plant, 616 East Sunkist Avenue, Ontario, California."
5. Bowyer Environmental Consulting, Inc. July 31, 2009. "Interim Report - Soil Removal and Confirmation Sampling - Former Sunkist Citrus Processing Plant, 616 East Sunkist Avenue, Ontario, California."
6. Bowyer Environmental Consulting, Inc. September 18, 2009. "Additional Investigation - Pre-Demolition Site Characterization - Former Sunkist Citrus Processing Plant, 616 East Sunkist Avenue, Ontario, California."
7. Bowyer Environmental Consulting, Inc. January 15, 2010. "UST Removal Report - Soil Removal and Confirmation Sampling - Former Sunkist Citrus Processing Plant, 616 East Sunkist Avenue, Ontario, California."
8. California Department of Water Resources, 2006, "California Groundwater - Bulletin 118."
9. California Environmental Protection Agency. January 2005. "Use of California Human Health Screening Levels (CHHSLs) in Evaluation of Contaminated Properties."
10. City of Ontario Planning Department. February 2007. "Historical Context for the City of Ontario Citrus Industry."
11. DTSC. Undated, "Evaluation of Arsenic as a Chemical of Potential Concern at Proposed School Sites in the Los Angeles Area."
12. DTSC. June 6, 2005. "Final Report - "Background Metals at Los Angeles Unified School Sites - Arsenic."
13. Leighton and Associates. September 8, 2008. "Phase I Environmental Site Assessment (ESA) for the Sunkist Processing Facility, 616 East Sunkist Avenue, Ontario, California."

14. Leighton and Associates. November 6, 2008. "Limited Phase II Environmental Site Assessment Report for the Sunkist Processing Facility, 616 East Sunkist Avenue, Ontario, California."
15. San Bernardino County Fire Department – Hazardous Materials Division. February 1, 2010. "Removal of (1) Underground Storage Tank (UST) at 616 Sunkist Street, Ontario, California."

Figures

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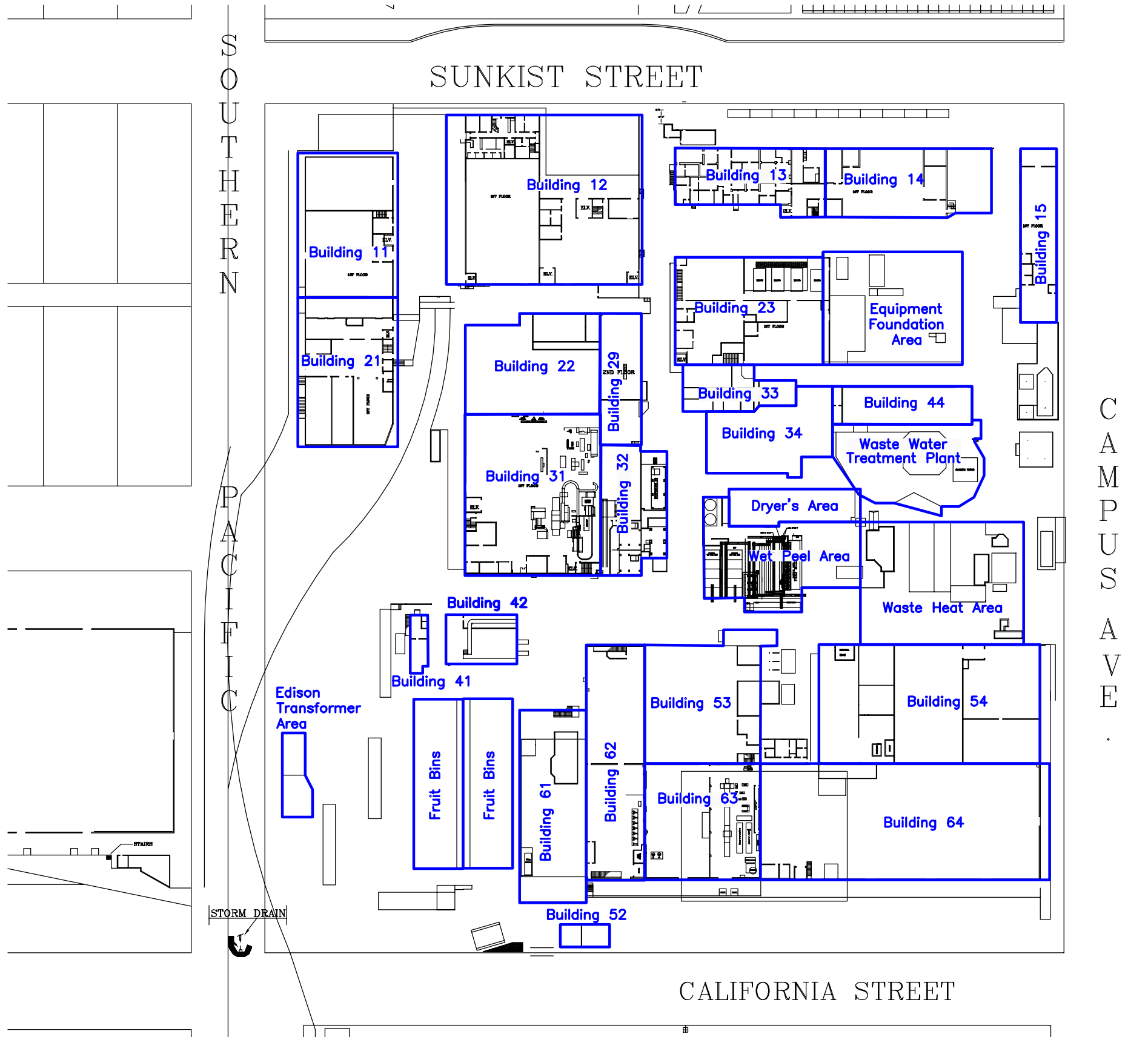
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Huntington Beach, CA 92649
Tel. (877) 232-4620
Fax (714) 840-4963

SITE LOCATION MAP

SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California

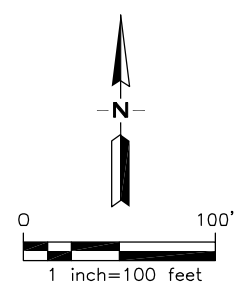
Project No.
08010001

Figure
1



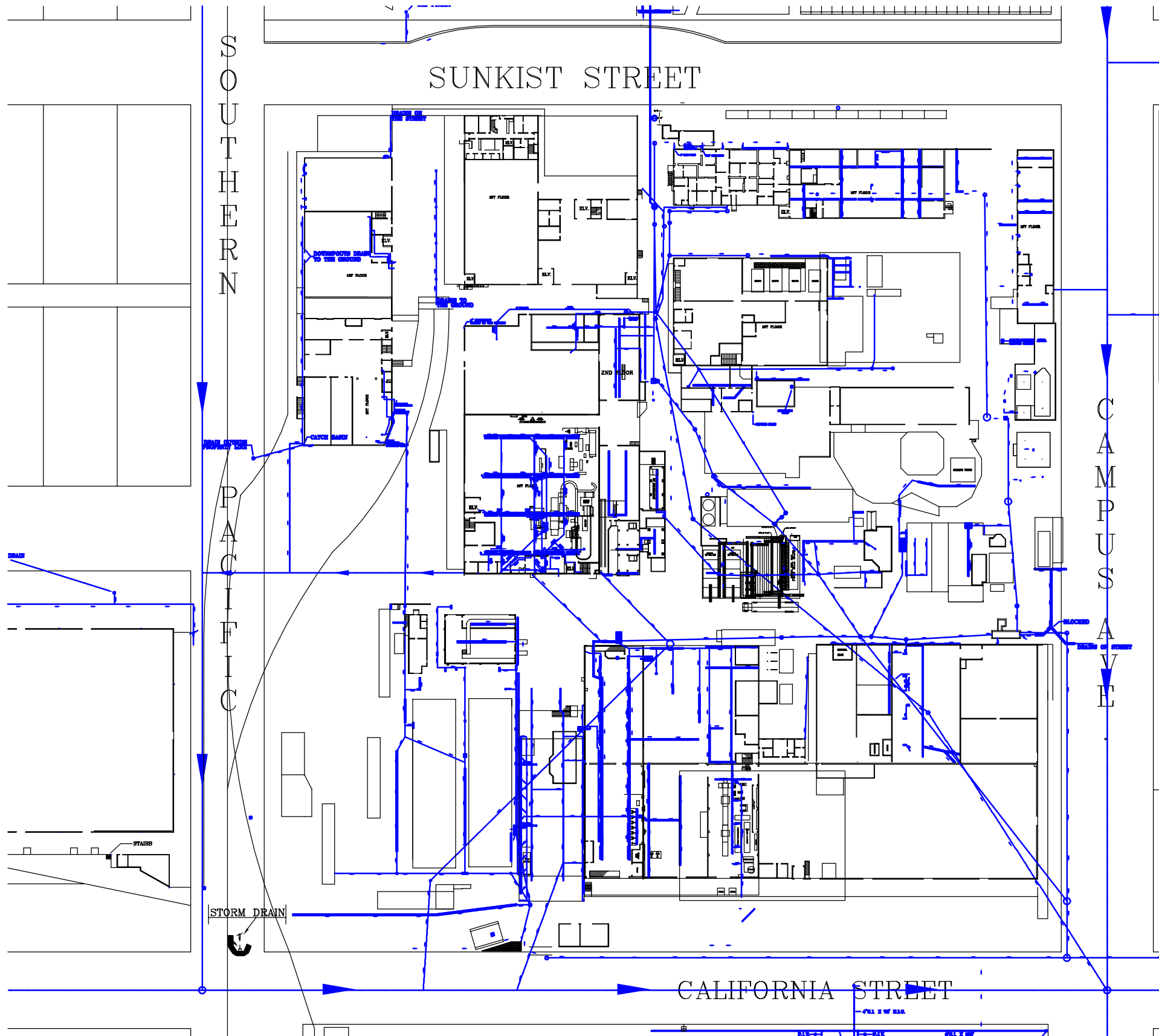
LEGEND

 Operational Area



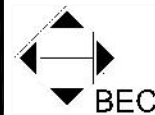
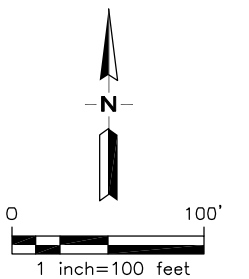
 <p>BEC 16458 Bolsa Chica Street, #422 Huntington Beach, CA 92649 Tel. (877) 232-4620 Fax (714) 840-4963</p>	<p>OPERATIONAL AREAS</p> <p>SUNKIST CITRUS PROCESSING PLANT</p> <p>616 East Sunkist Street, Ontario, California</p>	<p>Project No.</p> <p>08010001</p>	<p>Figure</p> <p>2</p>
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Storm Drain or Sewer System



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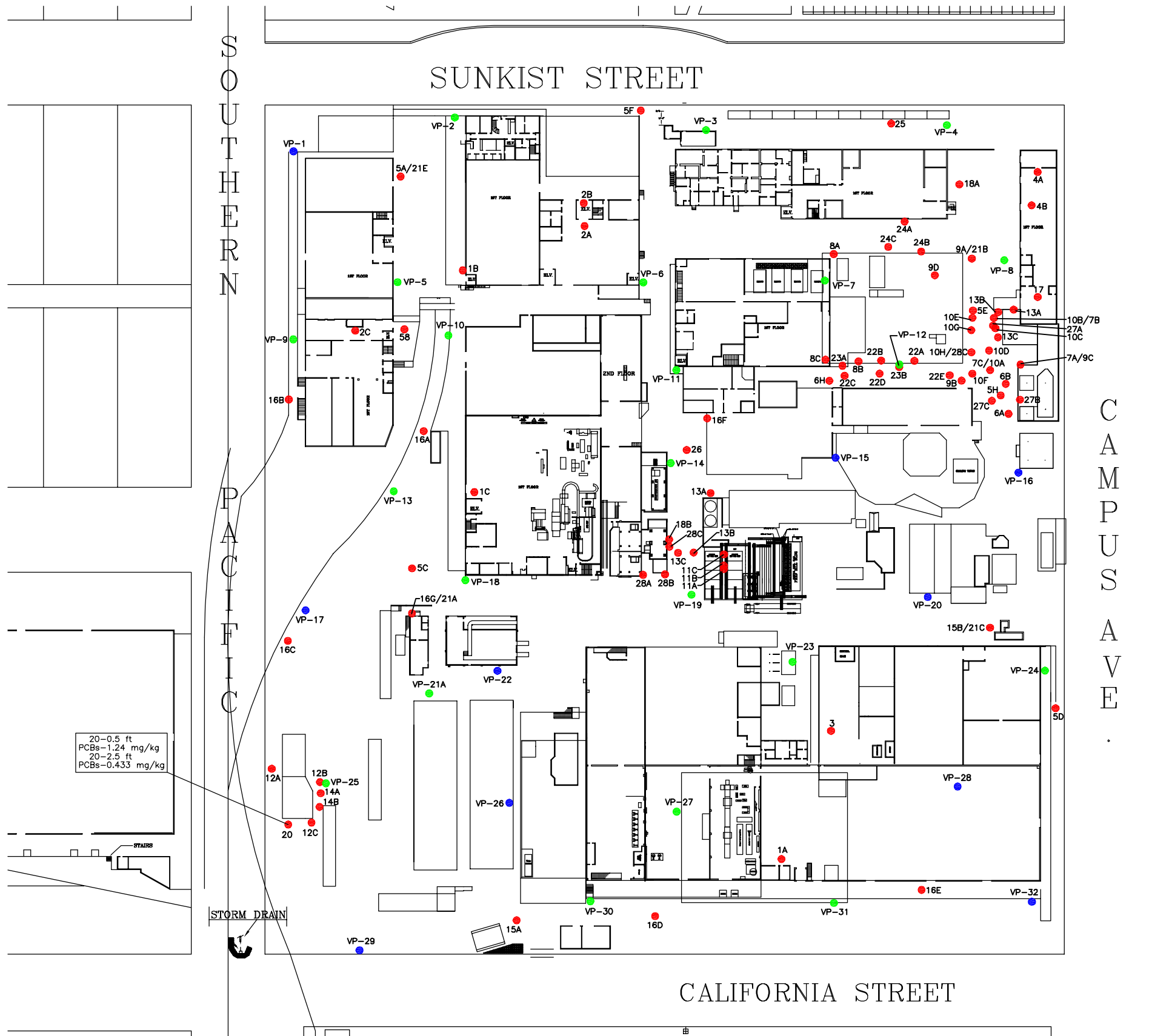
SUBSURFACE DRAINAGE SYSTEM

SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California

Project No.
08010001

Figure
H

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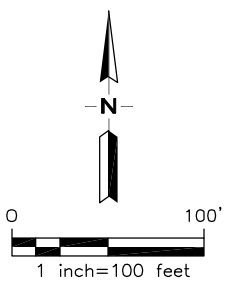


LEGEND

- 18A ● Previously Installed Soil Boring Location and Designation
- VP-26 ● Recently Installed Boring – Shallow Soil Samples Analyzed for Full Suite of Parameters.
- VP-14 ● Recently Installed Boring – Shallow Soil Samples Analyzed for Pesticides.

Notes:

1. Full suite of analyses = volatile organic compounds, semi-volatile organic compounds (or alternatively polynuclear aromatics), CAM metals, Polychlorinated biphenyls, pesticides and total petroleum hydrocarbons.
2. Shallow soil samples were collected from depths of 2 to 6 feet.

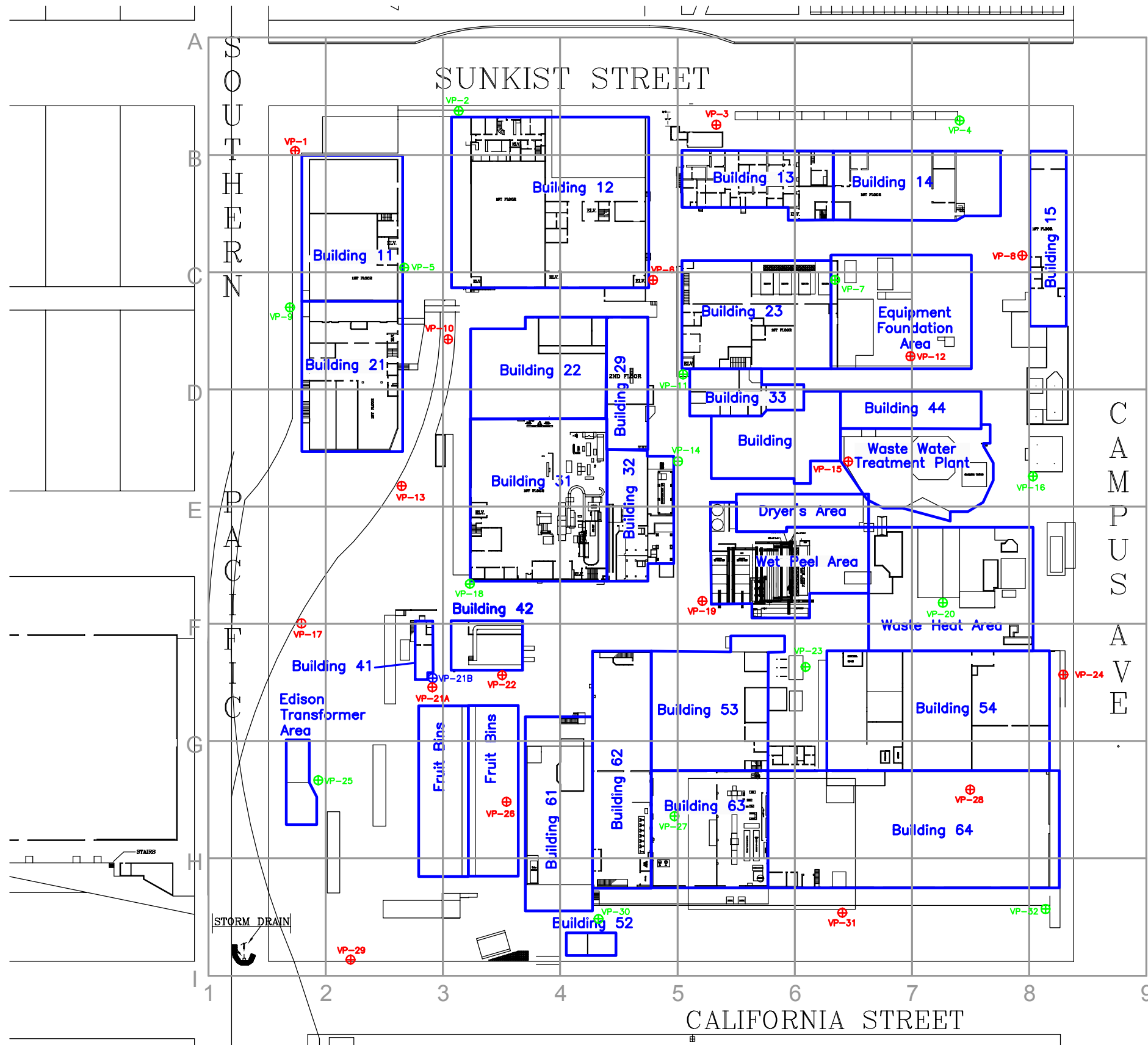


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SOIL SAMPLING LOCATION
SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California

Project No. 08010001	Figure 4
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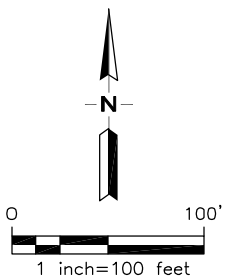


LEGEND

- Operational Area
- VP-3 Vapor Probe - 5 ft
- VP-4 Vapor Probe - 5 and 15 ft
- VP-21B Vapor Probe - 15 ft

Note:

Shallow soil samples were collected at each location at depth of 2 to 6 feet.



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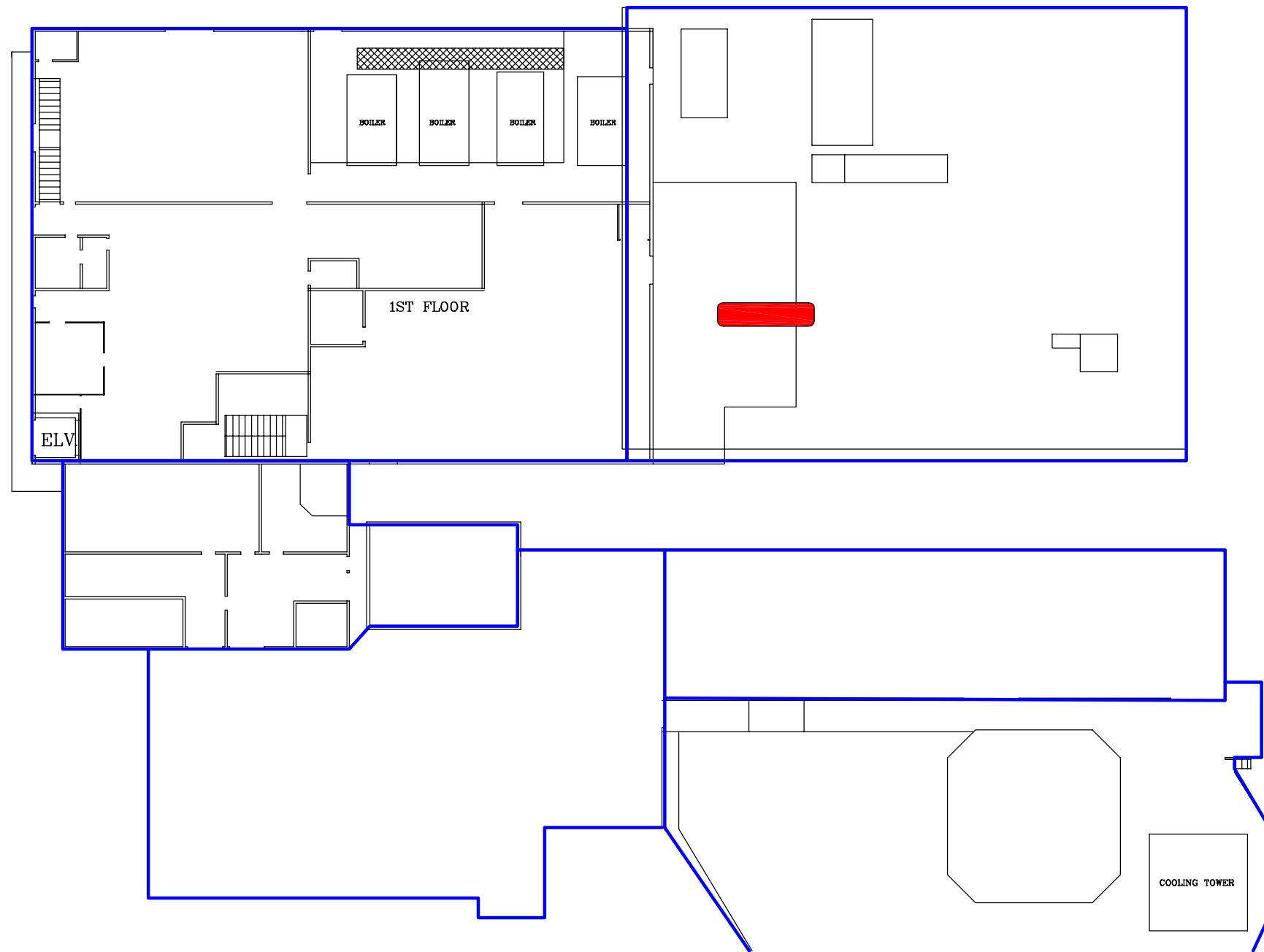
SOIL VAPOR SAMPLING LOCATIONS

SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California

Project No.
08010001

Figure
5

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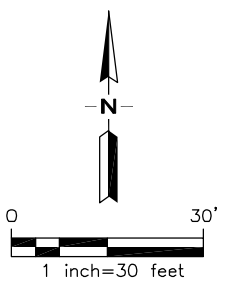
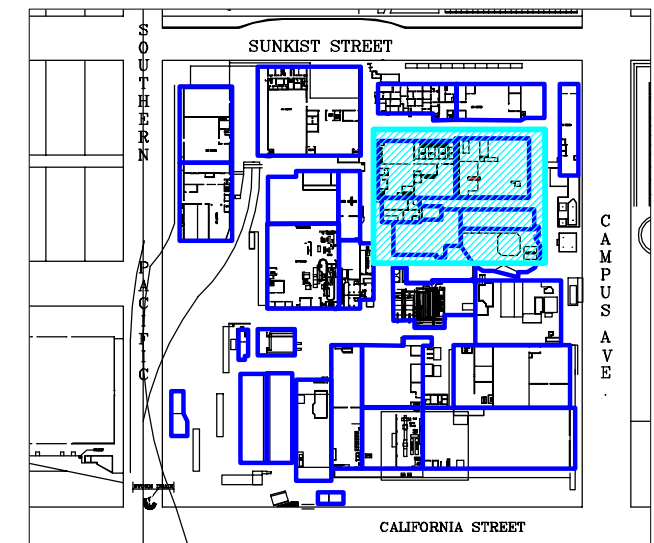


Operational Area



Underground Storage Tank - Closed in Place

KEY MAP

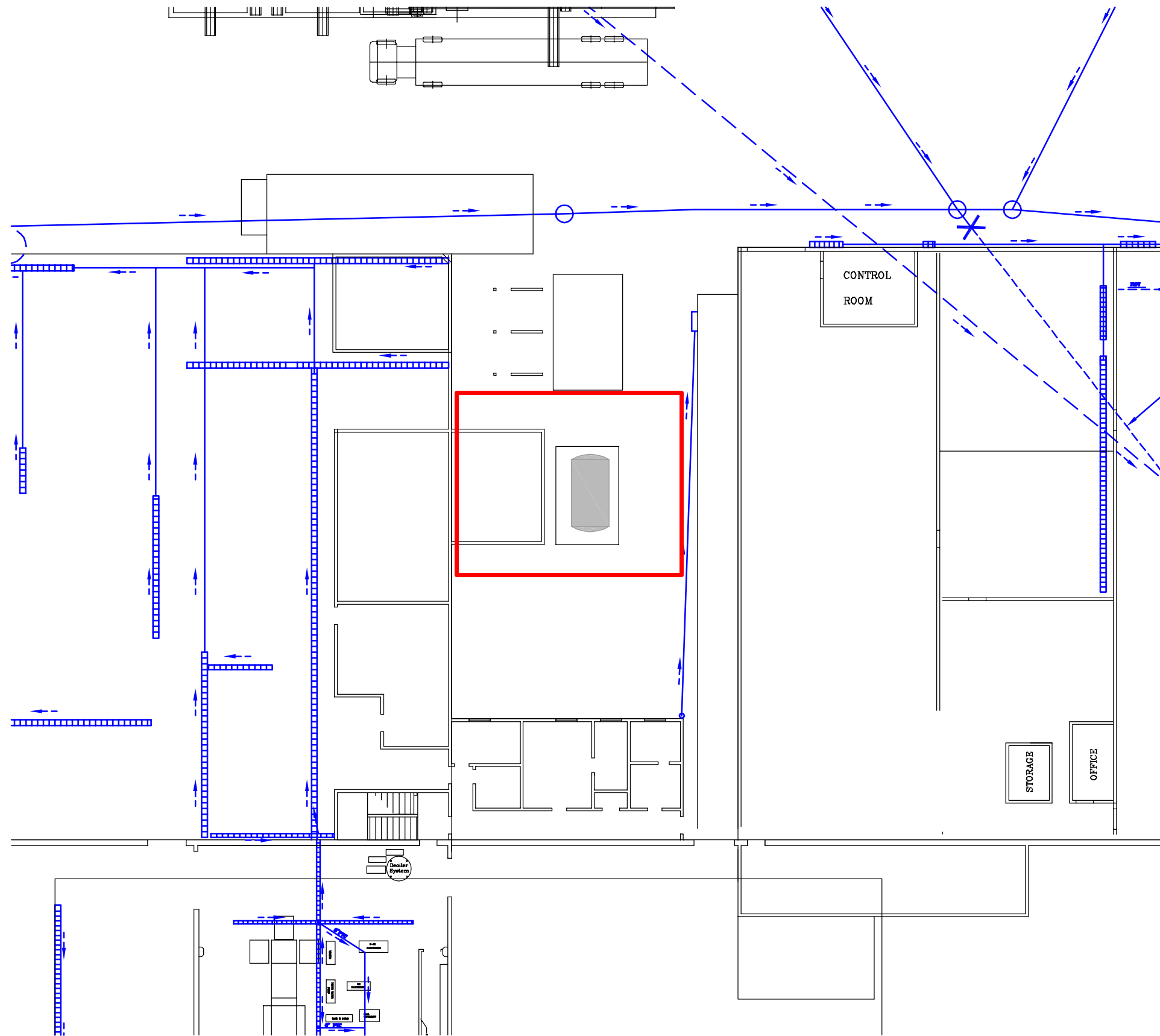


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LOCATION OF BURIED IN PLACE
UNDERGROUND STORAGE TANK
SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California

Project No.
08010003

Figure
6



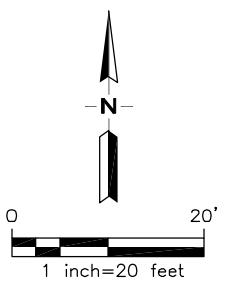
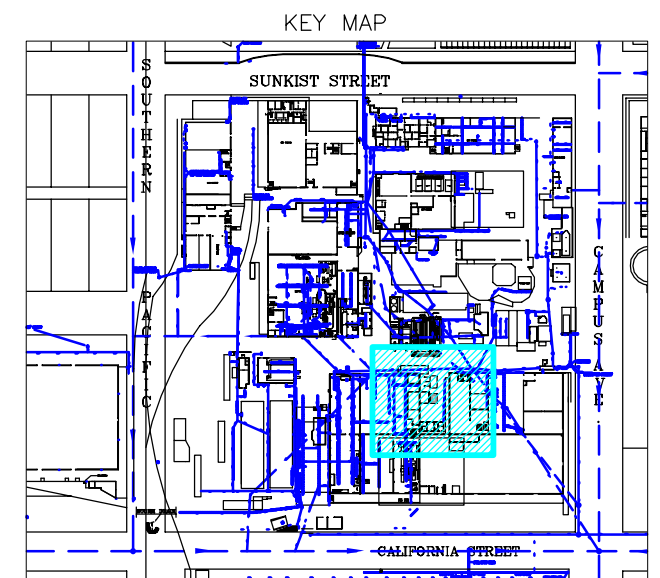
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Area Shown on Figure 4



Underground Storage Tank (Amonia)

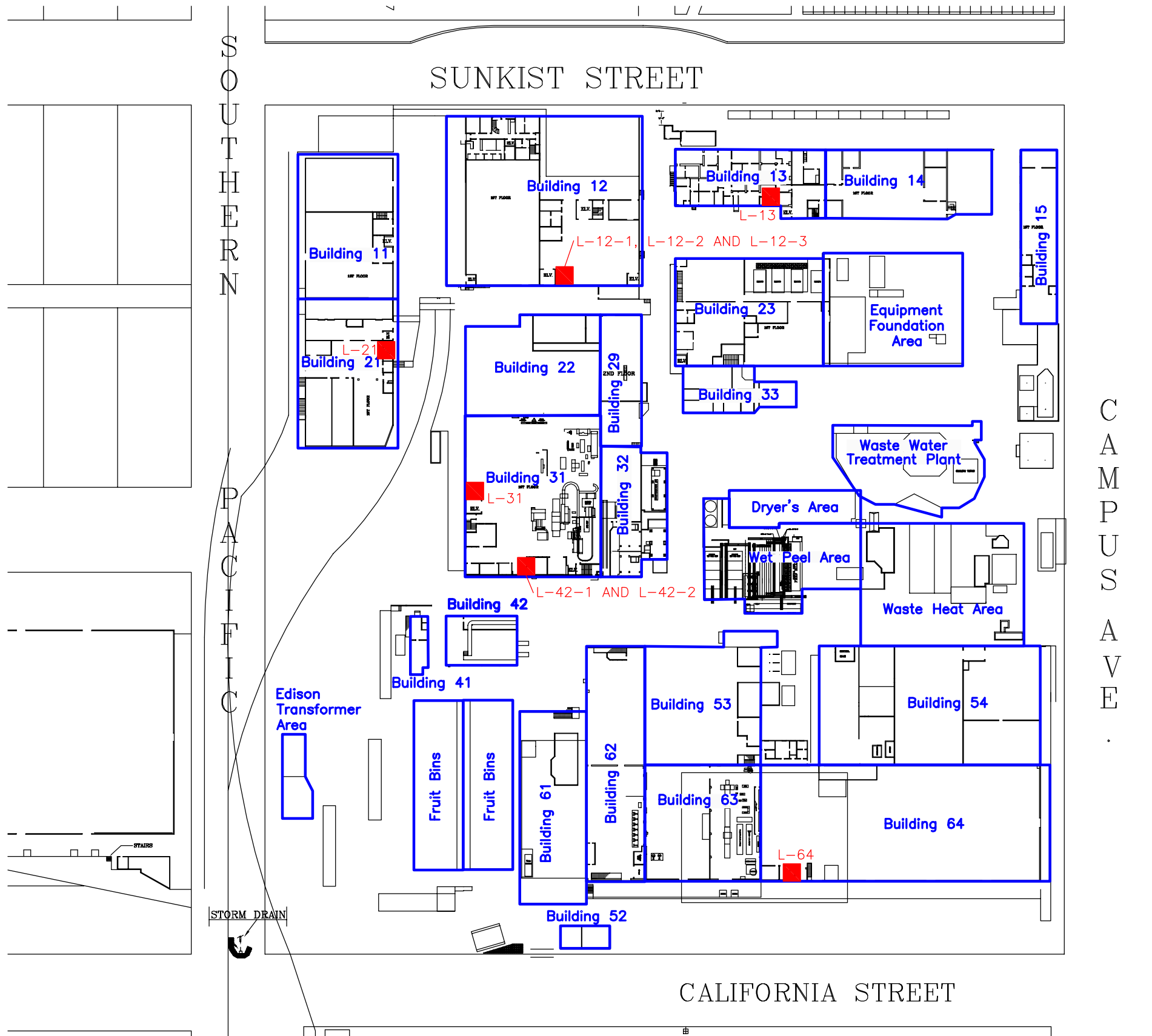


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FORMER LOCATION OF FRMOVED
UNDERGROUND STORAGE TANK
FORMER SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California

Project No.
08010003

Figure
7



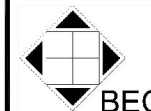
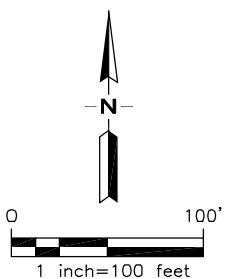
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Operational Area



Location of Lift Reservoir



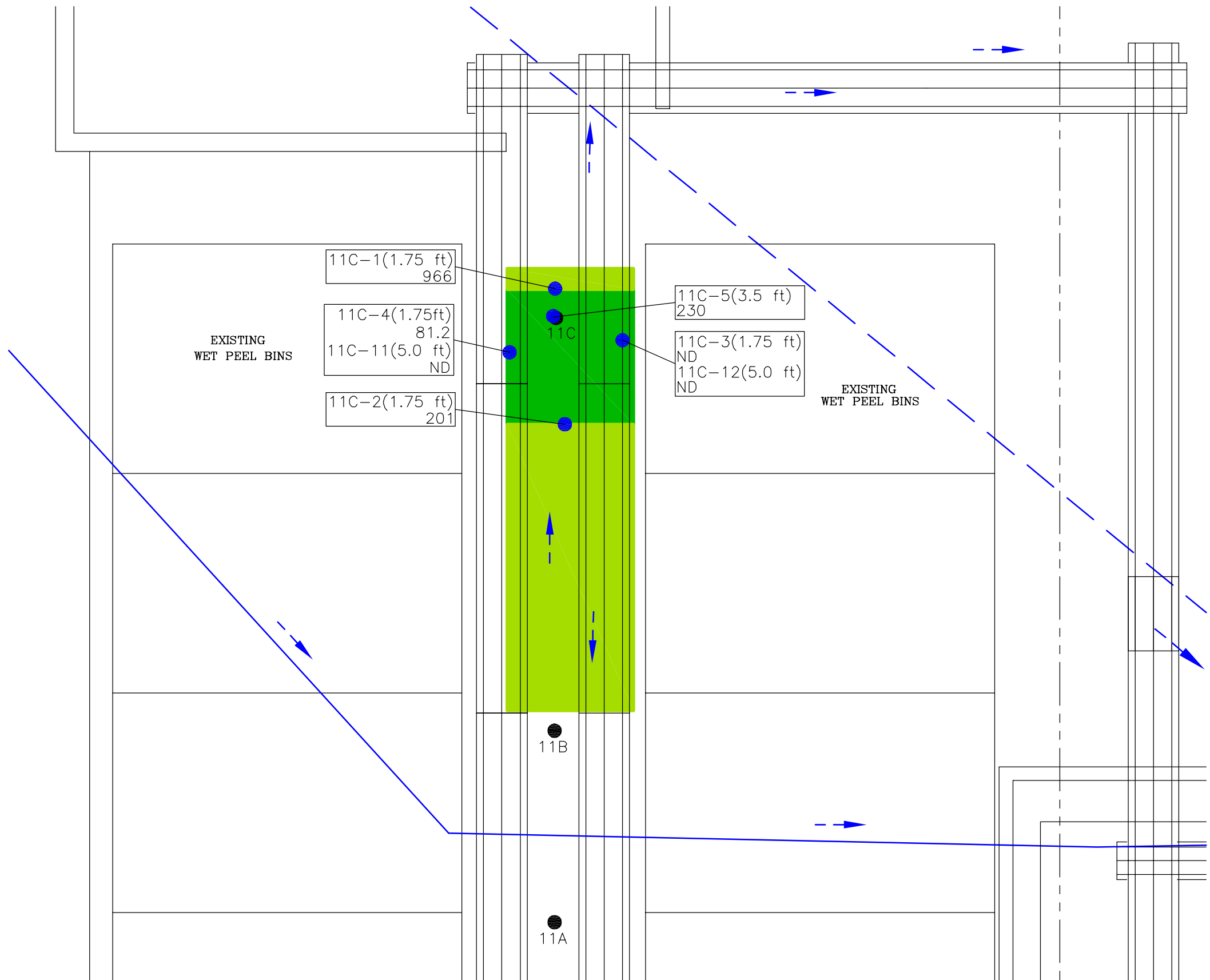
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LIFT RESERVOIR LOCATIONS
SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California

Project No.
08010003

Figure
8

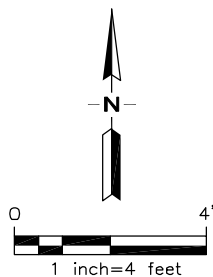
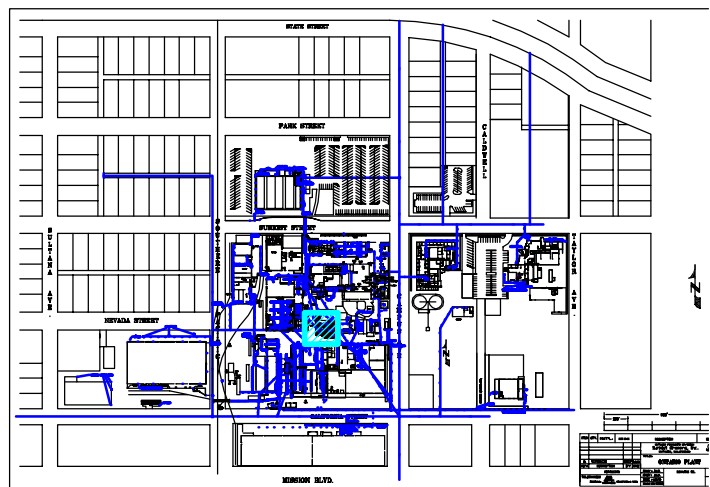
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- Previous Soil Boring Location
- 11C-2(1.75 ft) 201 Soil Sampling Locations with Results and Depth (See Figure 11 for Additional Sampling Locations-See Table 3 for Full Analytical Results)
- Soil Excavation No. 1 (April 24, 2009)
- Soil Excavation No. 5 (June 11, 2009)

KEY MAP



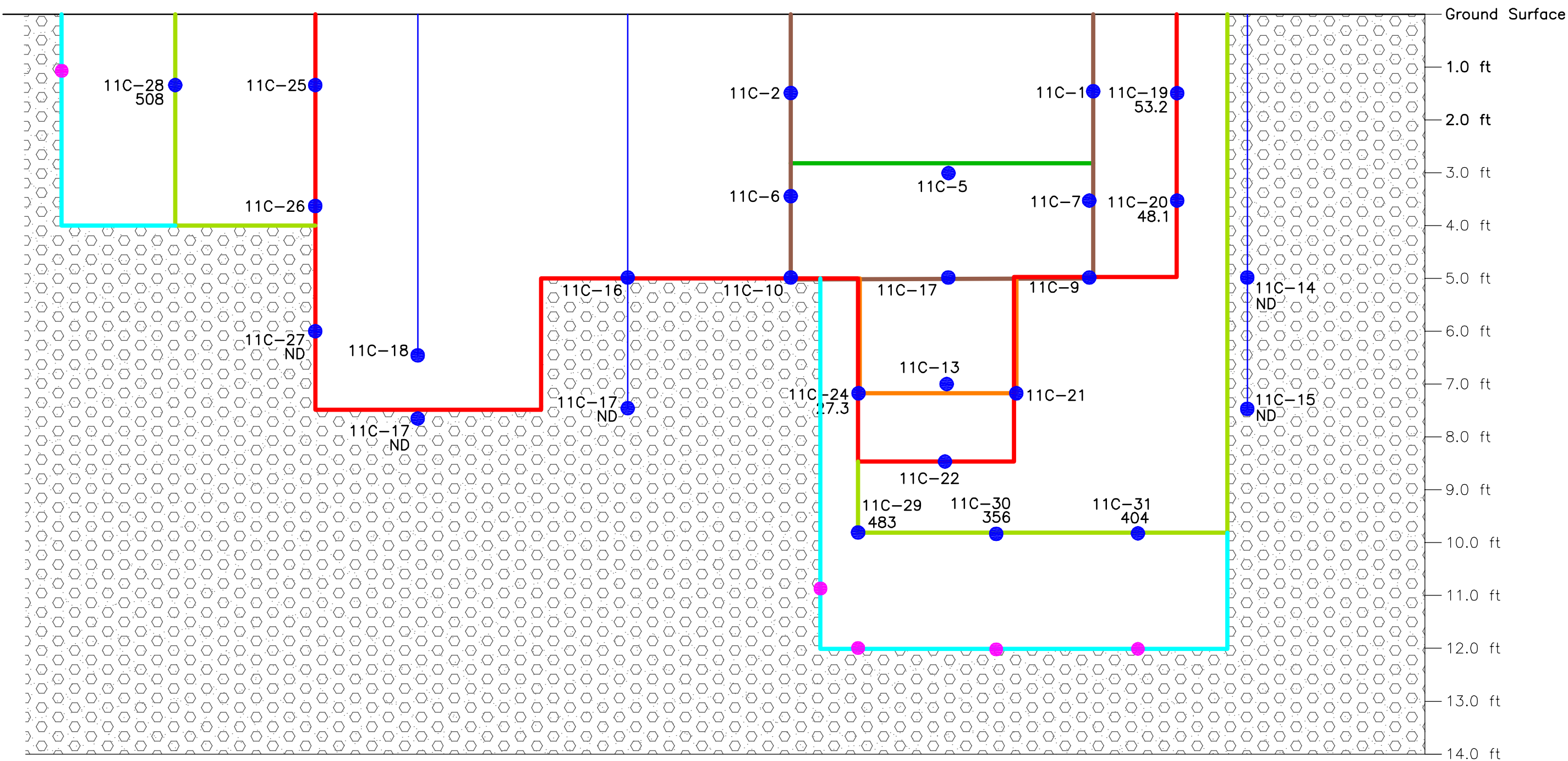
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EXCAVATION AREA AND
INITIAL PCB RESULTS - AREA 11
SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California

Project No.
08010003

Figure
9

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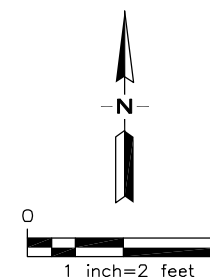
LEGEND

- 11C-20
53.2 ● Soil Sampling Locations and Results at Furthest
Extent of Excavation (See Table 3 for Results)
- Additional Planned Sampling Location
- Soil Excavation No. 1 to 3.0 ft (April 24, 2009)
- Soil Excavation No. 2 to 5.0 ft (May 9, 2009)
- Soil Excavation No. 3 to 7.0 ft (May 21, 2009)
- Soil Excavation No. 4 to 8.5 ft (June 2, 2009)
- Soil Excavation No. 5 to 10.0 ft (June 11, 2009)

- Additional Planned Excavation Removal Action
- Native Soil-Sand (Coarse Grained), Cobble

Notes:

1. PCBs = Polychlorinated Bipenyls
2. All PCB results are in milligrams per kilogram ($\mu\text{g}/\text{kg}$).



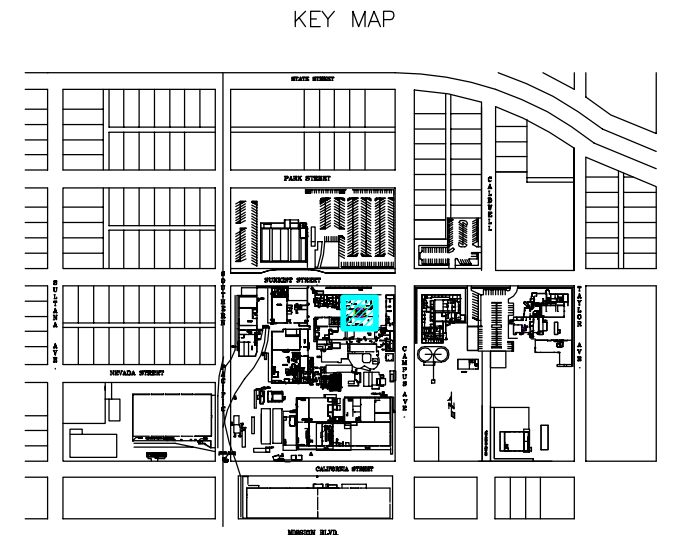
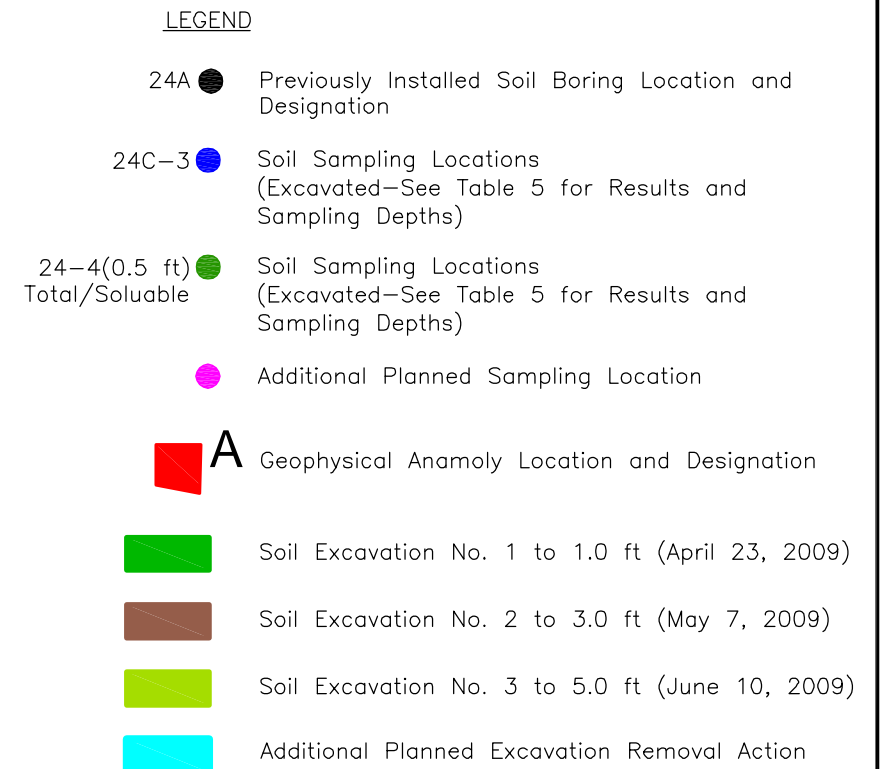
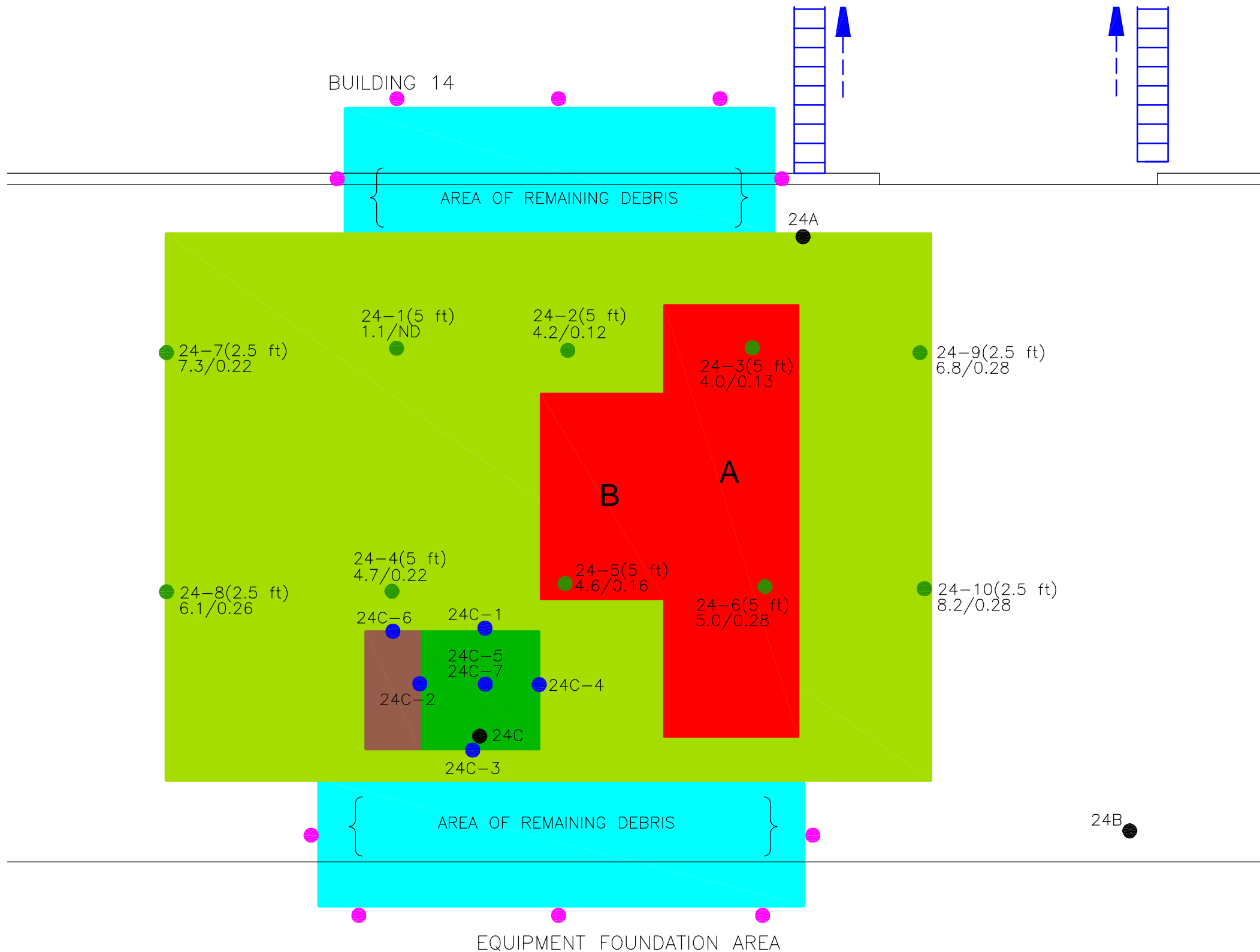
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**CROSS SECTION OF EXCAVATIONS
AREA 11C**
SUNKIST CITRUS PROCESSING PLANT
616 East Sunkist Street, Ontario, California

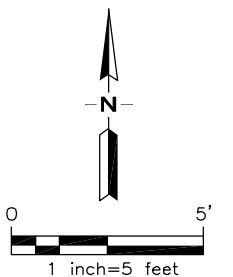
Project No.
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Figure
10

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Notes:
1. All total lead results are in milligrams per kilogram ($\mu\text{g}/\text{kg}$).
2. All soluble lead results are in milligrams per liter (mg/l).



Table

TABLE 1
PCBs in Lift Reservoirs
Former Sunkist Processing Plant
Ontario, California

Sample Identification	Phase	Sample Date							
			Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
L-12-1	Oil	4/13/2010	<50	<100	<50	<50	<50	<50	<50
L-12-2	Oil	4/13/2010	<50	<100	<50	<50	<50	<50	<50
L-12-3	Oil	4/13/2010	<50	<100	<50	<50	<50	<50	<50
L-13	Oil	4/13/2010	<50	<100	<50	<50	<50	<50	<50
L-13	Aqueous	4/13/2010	<10	<20	<10	<10	<10	<10	<10
L-21	Aqueous	4/13/2010	<10	<20	<10	<10	<10	<10	<10
L-31	Oil	4/13/2010	<50	<100	<50	<50	<50	<50	<50
L-42-1	Oil	4/13/2010	<50	<100	<50	<50	<50	<50	<50
L-42-2	Oil	4/13/2010	<50	<100	<50	<50	<50	<50	<50
L-64	Aqueous	2/11/2010	<5	<10	<5	<5	<5	78.50	<5

Screening Criteria

California MCL	0.5	0.5	0.5	0.5	0.5	0.5	0.5
USEPA MCL	0.5	0.5	0.5	0.5	0.5	0.5	0.5

Notes:

Results given in micrograms per liter (ug/l).

< = Not detected at or above the listed reporting limit.

Bold = Values > Screening Criteria.

California MCL = California Primary Maximum Contaminant Level.

USEPA MCL = United State Environmental Protection Agency Primary Maximum Contaminant Level.

Appendix A

Laboratory Reports – PCBs in Lift Reservoirs

ABC Environmental Laboratories

Mr. Brett Bowyer
Bowyer Environmental
16458 Balsa Chica St., #422
HB, CA 92649

2/15/2010

Project: Sunkist Growers
Project Site: Sunkist Growers
Sample Date: 2/11/2010
Lab Job No.: B10B010

Dear Mr. Brett Bowyer:

Enclosed please find the analytical report for the samples received by ABC Environmental Laboratories on 2/11/2010 and analyzed by the following EPA methods:

EPA 8082 (PCBs)

All analyses have met the QA/QC criteria of this laboratory.

The sample(s) arrived in good conditions (i.e., chilled, intact) and with a chain of custody record attached.

ABC Environmental Laboratories is certified by the CA DHS (Certificate No.2584). Thank you for giving us the opportunity to serve you.

Please feel free to call me at (909)923-8628 if our laboratory can be of further service to you.

Respectfully,

ABC Environmental Laboratories, Inc.

Ken Zheng, M.S.
Laboratory Director



Enclosures

This cover letter is an integral part of this analytical report.

ABC Environmental Laboratories

Client:	Bowyer Environmental	Lab Job No.:	B10B010
Project:	Sunkist Growers	Date Sampled:	2/11/2010
Project Site:	Sunkist Growers	Date Received:	2/11/2010
Matrix:	Sludge	Date Analyzed:	2/12/2010
Batch No.:	0212-PCBS	Date Reported:	2/15/2010

EPA 8082 (PCBs)

Reporting Unit: µg/kg (PPB)

Dilution Factor		1			
Lab Sample I.D.		B10B010-1			
Client Sample I.D.		B64-L1A			
Compound	RL				
PCB-1016	5	ND			
PCB-1221	10	ND			
PCB-1232	5	ND			
PCB-1242	5	ND			
PCB-1248	5	ND			
PCB-1254	5	78.5			
PCB-1260	5	ND			

ND: Not Detected (Below Reporting Limit).

ABC Environmental Laboratories

EPA Method 8082 (PCBs)

Batch QA/QC Report

Client: Bowyer Environmental

Lab Job No.: B10B010

Project: Sunkist Growers

Lab Sample ID: LCS

Matrix: Sludge

Date Analyzed: 2/12/2010

Batch No.: 0212-PCBS

Date Reported: 2/15/2010

MB/LCS/LCSD Report

Unit: ug/kg

Analyte	Method Blank	Spike Conc.	LCS	LCSD	LCS %Rec.	LCSD %Rec.	%RPD	%RPD Accept Limit	%Rec. Accept Limit
PCB-1254	ND	500	423	455	85	91	7	≤30	75-130

ND: Not Detected (Below Reporting Limit).

**Environmental
Laboratories, Inc.**

ABC Environmental Laboratories

Mr. Brett Bowyer
Bowyer Environmental
16458 Balsa Chica St., #422
HB, CA 92649

4/18/2010

Project: Sunkist Growers
Project Site: Sunkist Growers
Sample Date: 4/13/2010
Lab Job No.: B10D016

Dear Mr. Brett Bowyer:

Enclosed please find the analytical report for the samples received by ABC Environmental Laboratories on 4/13/2010 and analyzed by the following EPA methods:

EPA 8082 (PCBs)

All analyses have met the QA/QC criteria of this laboratory.

The sample(s) arrived in good conditions (i.e., chilled, intact) and with a chain of custody record attached.

ABC Environmental Laboratories is certified by the CA DHS (Certificate No.2584). Thank you for giving us the opportunity to serve you.

Please feel free to call me at (909)923-8628 if our laboratory can be of further service to you.

Respectfully,

ABC Environmental Laboratories, Inc.

Ken Zheng, M.S.
Laboratory Director



Enclosures

This cover letter is an integral part of this analytical report.

ABC Environmental Laboratories

Client:	Bowyer Environmental	Lab Job No.:	B10D016
Project:	Sunkist Growers	Date Sampled:	4/13/2010
Project Site:	Sunkist Growers	Date Received:	4/13/2010
Matrix:	Oil	Date Analyzed:	4/15/2010
Batch No.:	0415-PCBS	Date Reported:	4/18/2010

EPA 8082 (PCBs)

Reporting Unit: µg/kg (PPB)

Dilution Factor		50	50	50	50	50
Lab Sample I.D.		B10D016-1	B10D016-3	B10D016-4	B10D016-5	B10D016-7
Client Sample I.D.		L-13(Oil Phase)	L-12-1	L-12-2	L-12-3	L-31
Compound	RL					
PCB-1016	50	ND	ND	ND	ND	ND
PCB-1221	100	ND	ND	ND	ND	ND
PCB-1232	50	ND	ND	ND	ND	ND
PCB-1242	50	ND	ND	ND	ND	ND
PCB-1248	50	ND	ND	ND	ND	ND
PCB-1254	50	ND	ND	ND	ND	ND
PCB-1260	50	ND	ND	ND	ND	ND

ND: Not Detected (Below Reporting Limit x Dilution Factor).

ABC Environmental Laboratories

Client: Bowyer Environmental
Project: Sunkist Growers
Project Site: Sunkist Growers
Matrix: Oil
Batch No.: 0415-PCBS

Lab Job No.: B10D016
Date Sampled: 4/13/2010
Date Received: 4/13/2010
Date Analyzed: 4/15/2010
Date Reported: 4/18/2010

EPA 8082 (PCBs)

Reporting Unit: µg/kg (PPB)

Dilution Factor		50	50			
Lab Sample I.D.		B10D016-8	B10D016-9			
Client Sample I.D.		L-42-1	L-42-2			
Compound	RL					
PCB-1016	50	ND	ND			
PCB-1221	100	ND	ND			
PCB-1232	50	ND	ND			
PCB-1242	50	ND	ND			
PCB-1248	50	ND	ND			
PCB-1254	50	ND	ND			
PCB-1260	50	ND	ND			

ND: Not Detected (Below Reporting Limit x Dilution Factor).

ABC Environmental Laboratories

Client: Bowyer Environmental
Project: Sunkist Growers
Project Site: Sunkist Growers
Matrix: Water & Sludge
Batch No.: 0415-PCBS

Lab Job No.: B10D016
Date Sampled: 4/13/2010
Date Received: 4/13/2010
Date Analyzed: 4/15/2010
Date Reported: 4/18/2010

EPA 8082 (PCBs)

Reporting Unit: µg/L (PPB)

Dilution Factor		1	1			
Lab Sample I.D.		B10D016-2	B10D016-6			
Client Sample I.D.		L-13(Water Phase)	L-21			
Compound	RL					
PCB-1016	10	ND	ND			
PCB-1221	20	ND	ND			
PCB-1232	10	ND	ND			
PCB-1242	10	ND	ND			
PCB-1248	10	ND	ND			
PCB-1254	10	ND	ND			
PCB-1260	10	ND	ND			

ND: Not Detected (Below Reporting Limit x Dilution Factor).

ABC Environmental Laboratories

EPA Method 8082 (PCBs)

Batch QA/QC Report

Client: Bowyer Environmental

Lab Job No.: B10D016

Project: Sunkist Growers

Lab Sample ID: LCS

Matrix: Oil

Date Analyzed: 4/15/2010

Batch No.: 0415-PCBS

Date Reported: 4/18/2010

MB/LCS/LCSD Report

Unit: ug/kg

Analyte	Method Blank	Spike Conc.	LCS	LCSD	LCS %Rec.	LCSD %Rec.	%RPD	%RPD Accept Limit	%Rec. Accept Limit
PCB-1254	ND	500	415	476	83	95	14	≤30	75-130

ND: Not Detected (Below Reporting Limit).

CHAIN OF CUSTODY

[illegible]

Matrix Code: DW=Drinking Water
GW=Ground Water
WW=Waste Water
SD=Solid Waste

SL=Sludge
SS=Soil/Sediment
AR=Air
PP=Pure Product

Preservative Code

$$\begin{array}{l} \text{IC=Ice} \\ \text{HC=HCl} \\ \text{HN=HNO}_3 \end{array}$$
$$\begin{aligned} \text{SH} &= \text{NaOH} \\ \text{ST} &= \text{Na}_2\text{S}_2\text{O}_3 \\ \text{HS} &= \text{H}_2\text{SO}_4 \end{aligned}$$

* Sample Container Types:
T=Tedlar Air Bag
G=Glass Container
ST= Steel Tube

B= Brass Tube
P=Plastic Bottle
V=VOA Vial

E= EnCore